

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Bilgin Şaşmaz,)	
)	
Plaintiff,)	
)	No. 4:14-cv-1901 ERW
v.)	
)	
County of St. Louis, Missouri, et al.,)	
)	
Defendants.)	

JOINT PROPOSED SCHEDULE

COME NOW the parties, by and through their attorneys, and respectfully submit a Joint Proposed Scheduling Plan pursuant to this Court’s Order of March 24, 2015 (Doc. # 12):

I. Scheduling Plan:

1. The parties agree that this case is properly assigned to Track 2 (Standard).
2. All motions for joinder of additional parties or amendment of the pleadings should be filed no later than June 8, 2015.
3. Discovery shall proceed in the following manner:
 - (a) The parties agree to produce all electronically stored information (ESI) in the format maintained unless the party receiving the information does not have the capability to read it. In that case, the documents will be produced in Portable Document Format (PDF) format.
 - (b) The parties agree that, pursuant to Federal Rule of Evidence 502(d), inadvertent production of any documents in this

proceeding shall not, for purposes of this proceeding or any other proceeding in any other court, constitute, on its own, a waiver of any attorney-client privilege or attorney work product applicable to those documents.

- (c) The parties shall make all disclosures required by Fed. R. Civ. P. 26(a)(1) and including disclosure of locations and format of all discoverable electronically stored information (ESI) no later than May 22, 2015.
- (d) Discovery shall not be conducted in phases or limited to certain issues.
- (e) The parties may call expert witnesses.
 - 1. Plaintiff shall disclose expert witnesses and provide the reports required by Fed. R. Civ. P. 26(a)(2) no later than July 1, 2015. Plaintiff shall make experts available for deposition no later than August 3, 2015.
 - 2. Defendant shall disclose expert witnesses and provide the reports required by Fed. R. Civ. P. 26(a)(2) no later than September 1, 2015. Defendant shall make experts available for deposition no later than October 1, 2015.
 - 3. Any rebuttal experts shall be disclosed and shall provide the reports required by Fed. R. Civ. P. 26(a)(2), no later than October 16, 2015, and be made available for depositions no later than November 2, 2015.

- (f) The presumptive limit of twenty-five (25) interrogatories per party as set forth in Fed. R. Civ. P. 33(a), shall apply. The presumptive limit of ten (10) depositions per side as set forth in Fed. R. Civ. P. 30(a)(2)(A) shall apply.
 - (g) Motions for physical or mental examinations of the parties pursuant to Fed. R. Civ. P. 35 will not be made.
 - (h) The parties shall complete all discovery in this case no later than November 20, 2015.
4. The plaintiff believes that referral of this action to mediation would be appropriate after July 13, 2015. Defendant does not believe that mediation would be fruitful at this time.
5. Any dispositive motion must be filed no later than December 18, 2015. Response for any such motion will be due within 28 days of filing the motion. A reply is due within 14 days of filing the response.
- II. Trial. The parties submit that this case will be ready for jury trial on or after March 1, 2016. It is anticipated that the length of time to try the case to verdict is approximately three days.

Respectfully submitted,

PETER J. KRANE
COUNTY COUNSELOR

By: /s/Priscilla F. Gunn
Priscilla F. Gunn, #29729MO
Associate County Counselor
Lawrence K. Roos Bldg.
41 So. Central Avenue
Clayton, MO. 63105
314-615-7042; Fax 314-615-3732
pgunn@stlouisco.com
**ATTORNEY FOR DEFENDANT ST.
LOUIS COUNTY**

/s/ Anthony E. Rothert
Anthony E. Rothert, #44827MO
Andrew McNulty, #67138MO
AMERICAN CIVIL LIBERTIES UNION OF
MISSOURI FOUNDATION
454 Whittier Street
St. Louis, Missouri 63108
Telephone: (314) 652-3114
Facsimile: (314) 652-3112
trothert@aclu-mo.org
amcnulty@aclu-mo.org

Gillian R. Wilcox, #61278MO
AMERICAN CIVIL LIBERTIES UNION OF
MISSOURI FOUNDATION
3601 Main Street
Kansas City, Missouri 64111
Telephone: (816) 470-9938
Facsimile: (314) 652-3112
gwilcox@alcu-mo.org

ATTORNEYS FOR PLAINTIFF

Certificate of Service

I certify that on April 3, 2015, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Anthony E. Rothert